

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NORTHWEST BIOTHERAPEUTICS, INC.,

Plaintiff,

v.

CANACCORD GENUITY LLC, CITADEL
SECURITIES LLC, G1 EXECUTION
SERVICES LLC, GTS SECURITIES LLC,
INSTINET LLC, LIME TRADING CORP.,
SUSQUEHANNA INTERNATIONAL
GROUP, LLP, and VIRTU AMERICAS
LLC,

Defendants.

Case No. 1:22-CV-10185 (GHW) (GWG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendants Susquehanna International Group, LLP (“SIG”) and G1 Execution Services LLC (“G1X”), by undersigned counsel, will move this Court before the Honorable Gabriel W. Gorenstein, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on a date set by the Court, for an order dismissing the Complaint (ECF #1) in its entirety pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act (“PSLRA”), and for such further relief as this Court deems just and proper.

SIG and G1X hereby join and incorporate by reference the joint motion to dismiss the Complaint filed on behalf of all defendants and the memorandum of law in support thereof. As the joint motion explains in footnote 1, SIG is uniquely positioned because it is not alleged to be (and is not) a broker-dealer and is not alleged to (and did not) submit any orders or trades in Plaintiff’s stock that are the subject of the claims. SIG therefore additionally moves to dismiss

the Complaint as to it because the Complaint does not make any substantive allegations against SIG other than that it purchased defendant G1X.¹ The Complaint therefore does not state any claim against SIG upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 2.B of the Court's Individual Practices and this Court's order, any opposition papers must be served on the undersigned attorney for SIG and G1X on or before May 4, 2023.

Dated: March 20, 2023

BALLARD SPAHR LLP

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International Group, LLP and
G1 Execution Services LLC*

¹ While SIG accepts as it must the allegations in the Complaint for purposes of this motion only, it is in fact not the direct parent of defendant G1X.